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December 30, 2014

Honorable Jerome B. Simandle, Chief Judge
United States District Court
Mitchell H. Cohen Building and United States Courthouse
4th and Cooper Streets
Camden, NJ 08101

*RE: U.S. v. Reeves, et al.
Docket No. 11-520 (JBS)*

Your Honor:

Defendants Bryan and Harbor House are scheduled for sentencing of January 8, 2015. I write to alert the court as follows: first, I have a trial scheduled to begin in state court January 5, 2015 that is expected to last no more than two weeks; second, we have motions pending seeking a new trial in this matter that remain unresolved; and third, I understand co-counsel either have asked for or intend to ask for a consolidated hearing on Guidelines issues common to all defendants. The parties have filed sentencing memoranda, but I will be mailing letters of support for Mr. Bryan under separate cover.

If the court is so inclined, I request guidance on whether sentencing is expected to proceed on January 8th. In the event my state court trial gets underway as scheduled, I will need a 7-14 day adjournment.

Respectfully,

/s/ J.S. Furlong

JOHN S. FURLONG

JSF/j

Cc: Patrick Duggan, Esquire, via ECF

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